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HANKINS PLASTIC SURGERY
ASSOCIATES, P.C. dba HANKINS
& SOHN PLASTIC SURGERY
ASSOCIATES

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IN RE HANKINS PLASTIC SURGERY
ASSOCIATES, P.C. dba HANKINS & SOHN
PLASTIC SURGERY ASSOCIATES

This Document Relates to:
2:23-cv-02112-RFB-DJA (Aurora)

Master File No. 2:23-cv-00824-RFB-DJA
Case No. 2:23-cv-02112-APG-RFB
**[PROPOSED] STIPULATION AND
ORDER OF THE DISMISSAL OF
SAMUEL M. SOHN AND W. TRACY
HANKINS WITHOUT PREJUDICE
AND CONTINUING THE TIME FOR
DEFENDANT HANKINS PLASTIC
SURGERY ASSOCIATES, P.C. TO
RESPOND TO THE COMPLAINT**

Defendants HANKINS PLASTIC SURGERY ASSOCIATES P.C. dba HANKINS PLASTIC SURGERY ASSOCIATES, a professional corporation; SAMUEL M. SOHN; and W. TRACY HANKINS (collectively, “Defendants” or “the Practice”), by and through their counsel of record, SCHNITZER JOHNSON & WATSON, CHTD., and Plaintiff CAROLINE AURORA (“Plaintiff”), by and through her counsel of record, RICHARD HARRIS LAW FIRM, hereby stipulate the following:

WHEREAS, Plaintiff filed her Class Action Complaint on November 21, 2023 (“the *Aurora Complaint*”) in the District Court of Clark County against HANKINS PLASTIC SURGERY ASSOCIATES, P.C. dba HANKINS & SOHN PLASTIC SURGERY ASSOCIATES,

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a professional corporation; SAMUEL M. SOHN (“Dr. Sohn”) W. TRACY HANKINS (“Dr. Hankins”), ROE DATA SECURITY COMPANY; ROE IT CONSULTING FIRM; ROE NETWORK SECURITY SERVICE PROVIDER; DOE EMPLOYEES 1-10; DOES 11-20 and ROE BUSINESS ENTITIES 3-10, inclusive;

WHEREAS, the *Aurora* Complaint was removed to the United States District Court for the District of Nevada and an Order Transferring the Case was entered on January 19, 2024, by the United States District Court for the District of Nevada in Case No. 2:23-cv-02112-RFB-DJA;

WHEREAS, the parties agree to stipulate to certain provisions and matters regarding litigating this matter as it relates to the *Aurora* Complaint;

NOW, THEREFORE, the parties hereto stipulate and agree as follows:

1. Defendant, SAMUEL M. SOHN is dismissed from this matter without prejudice;
2. Defendant, W. TRACY HANKINS is dismissed from this matter without prejudice;
3. Due to the complexity of this class action, good cause exists and the parties stipulate to an extension of time to allow Defendant HANKINS PLASTIC SURGERY ASSOCIATES, P.C. until **April 30, 2024** to file and serve its response to the *Aurora* Complaint.

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4. The other deadlines in this case are not affected by this stipulation. This is the first stipulation for the extension of time for Defendants to file their response to the *Aurora* Complaint.

IT IS SO AGREED AND STIPULATED:

DATED this 27th day of March, 2024.

SCHNITZER JOHNSON & WATSON, LTD.

/s/ L. Renee Green

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Attorneys for Defendant

Hankins Plastic Surgery Associates, P.C. dba

Hankins & Sohn Plastic Surgery Associates,

Samuel M. Sohn and W. Tracy Hankins

RICHARD HARRIS LAW FIRM

/s/ Jonathan B. Lee

CLARK SEEGMILLER, ESQ.

Nevada Bar No. 3873

JONATHAN B. LEE, ESQ.

Nevada Bar No. 13524

801 South Fourth Street

Las Vegas, NV 89101

Attorneys for Plaintiff

Caroline Aurora

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: March 27, 2024

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